

PRIVACY NOTICE – Investment operations

Previous update: January 2022

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

This Privacy Notice applies to persons whose personal data is collected in connection with CapMan funds' investment operations ("**you**"). Persons covered include e.g. the personnel, management and shareholders and other investors of target investments and potential target investments (each a "**Target**") as well as other persons on whom we receive personal data in connection with M&A and real estate transactions.



1. Data controllers

The controller of your personal data is CapMan Plc and/or one or more of its group companies. Each CapMan group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc
Privacy Matters
Ludviginkatu 6, 00130 Helsinki
Email privacy@capman.com

3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Contact details such as name, phone number, email address and professional address
- Information on the company you represent and your professional role
- Information on your relationship with the Target

- Information on your employment including compensation and benefits data
- Other information which we receive in connection with due diligence checks on a Target which may include your CV information, background checks, employee assessments and test results

4. Why do we collect and process personal data?

We process your personal data for the purposes of conducting proper due diligence on a Target, assessing the merits of investments, making investment decisions or recommendations, consummating M&A transactions as well as Targets' business and integration planning.

5. What is the legal basis for processing?

Under data protection laws, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is our contractual obligations and our legitimate interest to ensure due diligence and appropriate processes when making investments and to conduct our business appropriately and effectively.

6. What are our information sources?

We collect personal data typically from the Target, the seller of the Target, their advisors and the organization you represent. Additional information sources include public registers such as trade register and

corresponding foreign registers. Information sources are used within the limits of the applicable laws, and your consent is requested when necessary.

7. How and with whom do we share personal data?

We may share your personal data between different entities within the Group for the abovementioned purposes. Further, we use services of various service providers and may transfer personal data to such third-party service providers. Such services may include e.g. IT services related to software systems and various consultants and advisors. If required by law or regulation, we may disclose personal data to authorities. We may also share personal data if we are going to sell the Target to a new owner.

Sometimes we may need to transfer personal data outside the EU or EEA for instance because a service provider is in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you.

8. How long is the personal data retained?

We store your personal data only for as long as it is necessary for the purposes the data was collected for. When personal data is no longer needed, it will be deleted or anonymized, unless we have a legal obligation to retain data for a longer period or unless retention is

necessary for the purposes of securing our rights and fulfilling our obligations and for handling possible claims. This means that the retention periods vary depending on the processing purpose, type of personal data, and local requirements.

9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

10. What are your rights?

You are entitled to obtain information of your personal data that we process and to have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In case the data processing is based on your consent, you may at any

time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to privacy@capman.com. We will answer to your request within one month of receipt of your request unless there are justified reasons to

extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.